

EXHIBIT I

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Attorneys for Respondents STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S HOSPITAL

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

SERVICE EMPLOYEES
INTERNATIONAL UNION, LOCAL 715

Petitioner,

vs.

STANFORD HOSPITAL & CLINICS and
LUCILE PACKARD CHILDREN'S
HOSPITAL

Respondents.

Case No: 08-CV-00216-JF

**REQUEST FOR PRODUCTION OF
DOCUMENTS, SET NO. ONE**

Judge: HON. JEREMY FOGEL

PROPOUNDING PARTY: STANFORD HOSPITAL & CLINICS and LUCILE
PACKARD CHILDREN'S HOSPITAL

RESPONDING PARTY: SERVICE EMPLOYEES INTERNATIONAL
UNION, LOCAL 715

SET NUMBER: ONE

TO PETITIONER SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL 715
AND TO ITS ATTORNEYS OF RECORD:

Pursuant to Rule 34 the Federal Rules of Civil Procedure, Respondents
STANFORD HOSPITAL & CLINICS and LUCILE PACKARD CHILDREN'S

1 HOSPITAL ("RESPONDENT"), by their attorneys, Foley & Lardner LLP, hereby
2 demand that within thirty (30) days after service of these requests that Petitioner
3 SERVICE EMPLOYEES INTERNATIONAL UNION, LOCAL 715, produce and permit
4 for inspection and copying the documents and tangible things described below in its
5 possession, custody or control. The place and time for inspection shall be at the offices
6 of Foley & Lardner LLP, One Maritime Plaza, Suite 600, San Francisco, California, or
7 such other location and/or time as counsel for the parties may agree.

8 **DEFINITIONS AND INSTRUCTIONS**

9 The following definitions and instructions apply throughout this demand for
10 identification and production, unless the context clearly indicates otherwise:

11 A. "YOU" and "YOUR" shall mean and include SERVICE EMPLOYEES
12 INTERNATIONAL UNION, LOCAL 715 and any of its agents, affiliates,
13 representatives, or any other person or entity acting on its behalf.

14 B. This demand requires that YOU identify and produce all DOCUMENTS
15 and WRITINGS responsive to the following numbered demands which are in YOUR
16 possession or control or subject to YOUR control, wherever they may be located. The
17 DOCUMENTS and WRITINGS which YOU must identify and produce include not only
18 writings which YOU presently possess, but also writings which YOU are aware of
19 (regardless of whether they are in YOUR possession or not), DOCUMENTS and
20 WRITINGS that are in the possession or control of YOUR attorneys, accountants,
21 bookkeepers, employees, representatives, or anyone else acting on YOUR behalf.

22 B. YOU are requested to produce all DOCUMENTS and WRITINGS which
23 are responsive to the following numbered demands for inspection and photocopying at
24 the law offices of Foley & Lardner LLP, located at One Maritime Plaza, Sixth Floor, San
25 Francisco, California 94111-3404, 30 days after service of this demand (or the next
26 business day if that day falls on a Saturday, Sunday or court holiday).

27 C. All DOCUMENTS and WRITINGS which are responsive in whole or in
28

1 part to the following numbered demand shall be produced in full, without abridgment,
2 abbreviation or expurgation of any sort. If any such DOCUMENTS and WRITINGS
3 cannot be produced in full, produce the DOCUMENT and/or WRITING to the greatest
4 extent possible and indicate in YOUR written response what portion of the DOCUMENT
5 and/or WRITING is not produced and why it could not be produced.

6 D. The term "DOCUMENT" as used herein means and includes any and all
7 documents, tangible things, and all WRITINGS of any kind, including the originals and
8 all non-identical copies, whether different from the originals by reason of any notation
9 made on such copies or otherwise, and includes, without limitation, agreements, purchase
10 orders, invoices, receipts, accounting records, contracts, bills of lading, shipping records,
11 correspondence, memoranda, notes, diaries, statistics, letters, telegrams, telex, faxes,
12 minutes, contracts, reports, studies, statements, summaries, interoffice and intra-office
13 communications, notations of any sort of conversations, telephone calls, meetings or
14 other communications, computer printouts, tape recordings, audiotapes, videotapes,
15 charts, graphs, and electronic, mechanical or electronic records, compact discs, computer
16 discs, computer tapes, computer software, electronically stored media, and any other
17 form of stored information. The term "WRITINGS" as used herein means and includes
18 the definition of that term under Federal Rule of Evidence ("FRE") Rule 1001(1).

19 E. YOU are required to produce not only the original or an exact copy of the
20 original of all DOCUMENTS and WRITINGS responsive to the following numbered
21 demands, but also all copies of such DOCUMENTS and WRITINGS which bear any
22 notes or markings not found on the originals and all preliminary, intermediate, final, and
23 revised drafts of said DOCUMENTS and WRITINGS.

24 F. If YOU are not producing any DOCUMENT or WRITING responsive to
25 any of the numbered demands below on the basis of a claimed privilege, or for any other
26 reason, state the following information:

- 27 1. Describe the DOCUMENT and/or WRITING with specificity;
- 28 2. Identify the privilege claimed or other reason why the DOCUMENT

1 and/or WRITING is not produced;

2 3. State the names and capacities of all persons who participated in the
3 preparation of the DOCUMENT and/or WRITING; and

4 4. State the names and capacities of all persons to whom the
5 DOCUMENT and/or WRITING was circulated or its contents communicated.

6 G. "RELATING TO" or "RELATE(S) TO" are used in their broadest sense
7 and means referring to, describing, evidencing, containing, supporting, rebutting,
8 reflecting, refuting, negating, pertaining to, comprising, memorializing, identifying,
9 verifying, and/or in any way involving or having a logical connection to the subject
10 matter of the request, in whole or in part.

11 H. "COMPLAINT" means the operative complaint filed in the above
12 captioned action.

13 I. "RESPONDENT" means Stanford Hospital & Clinics and Lucile Packard
14 Children's Hospital.

15 J. "LOCAL" means any local union or labor organization affiliated with the
16 Service Employees International Union ("SEIU").

17 **REQUESTS FOR PRODUCTION**

18 **REQUEST FOR PRODUCTION NO. 1:**

19 Produce all DOCUMENTS and WRITINGS RELATING TO the identification of
20 counsel representing LOCAL 715 regarding the issues which are the subject of the
21 COMPLAINT.

22 **REQUEST FOR PRODUCTION NO. 2:**

23 Produce all DOCUMENTS and WRITINGS RELATING TO the present or future
24 representative capacity of LOCAL 715 regarding any employees of RESPONDENT from
25 June 30, 2005 to the present.

26 **REQUEST FOR PRODUCTION NO. 3:**

27 Produce all DOCUMENTS and WRITINGS RELATING TO the present or future
28 representative capacity of LOCAL 521, whether by that name or by other reference to the

1 entity which became LOCAL 521 when chartered by SEIU International, regarding any
2 employees of RESPONDENT from June 30, 2005 to the present.

3 **REQUEST FOR PRODUCTION NO. 4:**

4 Produce all DOCUMENTS and WRITINGS RELATING TO the present or future
5 representative capacity of SEIU-UHW regarding any employees of RESPONDENT from
6 June 30 2005 to the present.

7 **REQUEST FOR PRODUCTION NO. 5:**

8 Produce all DOCUMENTS and WRITINGS RELATING TO correspondence
9 between YOU and any SEIU International official and/or representative from June 30,
10 2005 to the present regarding the status of LOCAL 715 (including, without limitation, its
11 existence, its termination and/or its merger with or into another LOCAL, or the transfer
12 by any manner of any of its represented bargaining units to another LOCAL or
13 LOCALS).

14 **REQUEST FOR PRODUCTION NO. 6:**

15 Produce all DOCUMENTS and WRITINGS RELATING TO correspondence
16 between YOU and any SEIU-UHW official and/or representative from June 30, 2005 to
17 the present regarding the status of LOCAL 715 (including, without limitation, its
18 existence, its termination and/or its merger with or into another LOCAL, or the transfer
19 by any manner of its represented bargaining units to another LOCAL or LOCALS).

20 **REQUEST FOR PRODUCTION NO. 7:**

21 Produce all DOCUMENTS and WRITINGS RELATING TO correspondence
22 between YOU and any LOCAL 521 official and/or representative from June 30, 2005 to
23 the present regarding the status of LOCAL 715 (including, without limitation, its
24 existence, its termination and/or its merger with or into another LOCAL, or the transfer
25 by any manner of any of its represented bargaining units to another LOCAL or
26 LOCALS).

27 **REQUEST FOR PRODUCTION NO. 8:**

28 Produce all DOCUMENTS and WRITINGS RELATING TO correspondence

1 between YOU and any LOCAL 715 official and/or representative from June 30, 2005 to
2 the present regarding the status of LOCAL 715 (including, without limitation, its
3 existence, its termination and/or its merger with or into another LOCAL, or the transfer
4 by any manner of any of its represented bargaining units to another LOCAL or
5 LOCALS).

6 **REQUEST FOR PRODUCTION NO. 9:**

7 Produce all DOCUMENTS and WRITINGS RELATING TO the handling of any
8 funds (including, without limitation, dues payments) RELATING TO LOCAL 715
9 (including, without limitation, all deposits, payments and transfers of said funds) from
10 January 2007 to the present.

11 **REQUEST FOR PRODUCTION NO. 10:**

12 Produce all DOCUMENTS and WRITINGS RELATING TO the affairs and
13 transactions of LOCAL 715 from January 2006 to the present (including, without
14 limitation, all reports and monitoring activities of said affairs and transactions).

15 **REQUEST FOR PRODUCTION NO. 11:**

16 Produce all DOCUMENTS and WRITINGS RELATING TO the establishment of
17 a trusteeship for LOCAL 715 from January 2007 to the present.

18 **REQUEST FOR PRODUCTION NO. 12:**

19 Produce all DOCUMENTS and WRITINGS RELATING TO LOCAL 715's
20 website from January 2007 to the present including, without limitation, all links from the
21 website to other sites, all references to LOCAL 715's status (including existence,
22 termination or merger with or into another LOCAL), all references to LOCAL 715's
23 funds, and all references to LOCAL 715's officers and/or trustees. This request
24 specifically includes all versions of LOCAL 715's website during the time period
25 including, without limitation, all changes to the website and the reasons for such changes.

26 **REQUEST FOR PRODUCTION NO. 13:**

27 Produce all DOCUMENTS and WRITINGS RELATING TO LOCAL 521's
28 website from January 2007 to the present including, without limitation, all links from the

1 website to other sites, all references to LOCAL 521's status (including its creation,
2 existence, or merger with other LOCALS), all references to LOCAL 521's funds, and all
3 references to LOCAL 521's officers and/or trustees. This request specifically includes all
4 versions of LOCAL 521's website during the time period including, without limitation,
5 all changes to the website and the reasons for such changes.

6 **REQUEST FOR PRODUCTION NO. 14:**

7 Produce all DOCUMENTS and WRITINGS RELATING TO SEIU-UHW's
8 website from January 1, 2006 to the present including, without limitation, all links from
9 the website to other sites, all references to SEIU-UHW's status in any capacity as
10 representative of any employees of RESPONDENT, and all references to SEIU-UHW's
11 receipt of funds from SEIU-LOCAL 715 and/or SEIU-LOCAL 521. This request
12 specifically includes all versions of SEIU-UHW's website during the time period
13 including, without limitation, all changes to the website and the reasons for such changes.

14 **REQUEST FOR PRODUCTION NO. 15:**

15 Produce all DOCUMENTS and WRITINGS RELATING TO any correspondence
16 between YOU and LOCAL 715 regarding LOCAL 715's website and/or any changes
17 thereto from January 1, 2007 to the present.

18 **REQUEST FOR PRODUCTION NO. 16:**

19 Produce all DOCUMENTS and WRITINGS RELATING TO any correspondence
20 between YOU and LOCAL 521 regarding LOCAL 521's website and/or changes thereto
21 from January 1, 2007 to the present.

22 **REQUEST FOR PRODUCTION NO. 17:**

23 Produce all DOCUMENTS and WRITINGS RELATING TO any correspondence
24 between YOU and SEIU-UHW regarding SEIU-UHW's website and/or changes thereto
25 from January 2006 to the present.

26 **REQUEST FOR PRODUCTION NO. 18:**

27 Produce all DOCUMENTS and WRITINGS RELATING TO any Servicing
28 Agreement between LOCAL 715 and SEIU-UHW.

REQUEST FOR PRODUCTION NO. 19:

Produce all DOCUMENTS and WRITINGS RELATING TO any Servicing Agreement between LOCAL 715 and SEIU LOCAL 1877 or its successors or affiliated LOCALS.

REQUEST FOR PRODUCTION NO. 20:

Produce all DOCUMENTS and WRITINGS RELATING TO Weinberg, Roger & Rosenfeld's representation of LOCAL 715 from January 2006 to the present. This request does not seek production of DOCUMENTS and WRITINGS concerning counsel's advice but merely seeks production of DOCUMENTS and WRITINGS RELATING TO Weinberg, Roger & Rosenfeld's retention to represent LOCAL 715.

REQUEST FOR PRODUCTION NO. 21:

Produce all DOCUMENTS and WRITINGS RELATING TO Altshuler Berzon LLP's representation of LOCAL 715 from January 2007 to the present. This request does not seek production of DOCUMENTS and WRITINGS concerning counsel's advice but merely seeks production of DOCUMENTS and WRITINGS RELATING TO Altshuler Berzon's retention to represent LOCAL 715.

REQUEST FOR PRODUCTION NO. 22:

Produce all DOCUMENTS and WRITINGS RELATING TO YOUR receipt of funds from SEIU-LOCAL 715.

REQUEST FOR PRODUCTION NO. 23:

Produce all DOCUMENTS and WRITINGS RELATING TO YOUR receipt of funds from SEIU-LOCAL 521

REQUEST FOR PRODUCTION NO. 24:

Produce all DOCUMENTS and WRITINGS RELATING TO LOCAL 715's transfer and/or payment of funds to SEIU-UHW.

REQUEST FOR PRODUCTION NO. 25:

Produce all DOCUMENTS and WRITINGS RELATING TO LOCAL 521's transfer and/or payment of funds to SEIU-UHW.

REQUEST FOR PRODUCTION NO. 26:

Produce all DOCUMENTS and WRITINGS RELATING TO LOCAL 521's transfer and/or payment of funds to SEIU LOCAL 1877 or its successor or affiliated LOCALS.

REQUEST FOR PRODUCTION NO. 27:

Produce all DOCUMENTS and WRITINGS RELATING TO any exchange of funds between LOCAL 715 and LOCAL 521 (including, without limitation, any transfer of funds, payment of funds and/or receipt of funds).

REQUEST FOR PRODUCTION NO. 28:

Produce all DOCUMENTS and WRITINGS RELATING TO all notices of Executive Board meetings and/or Special Executive Board meetings for LOCAL 715 between July 1, 2005 and June 9, 2007.

REQUEST FOR PRODUCTION NO. 29:

Produce all DOCUMENTS and WRITINGS RELATING TO all notices of Executive Board meetings and/or Special Executive Board meetings for LOCAL 521 between July 1, 2006 and June 9, 2007.

REQUEST FOR PRODUCTION NO. 30:

Produce all DOCUMENTS and WRITINGS RELATING TO all notices of Executive Board meetings and/or Special Executive Board meetings for SEIU-UHW between July 1, 2005 and June 9, 2007 which reference in any manner the representation of any employees of RESPONDENT.

REQUEST FOR PRODUCTION NO. 31:

Produce all DOCUMENTS and WRITINGS RELATING TO all minutes of Executive Board meetings for LOCAL 715 held between July 1, 2005 and June 9, 2007 including, without limitation, a list of those in attendance and those not in attendance at said meetings.

REQUEST FOR PRODUCTION NO. 32:

Produce all DOCUMENTS and WRITINGS RELATING TO all minutes of

1 Executive Board meetings for LOCAL 521 held between July 1, 2006 and June 9, 2007
2 including, without limitation, a list of those in attendance and those not in attendance at
3 said meetings.

4 **REQUEST FOR PRODUCTION NO. 33:**

5 Produce all DOCUMENTS and WRITINGS RELATING TO all minutes of
6 Executive Board meetings for SEIU-UHW held between July 1, 2005 and June 9, 2007
7 which reference in any manner the representation of any employees of RESPONDENT
8 including, without limitation, a list of those in attendance and those not in attendance at
9 said meetings.

10 **REQUEST FOR PRODUCTION NO. 34:**

11 Produce all DOCUMENTS and WRITINGS RELATING TO LOCAL 715's
12 annual budget and/or budgets covering and/or applicable to calendar year 2007 or any
13 portion thereof.

14 **REQUEST FOR PRODUCTION NO. 35:**

15 Produce all DOCUMENTS and WRITINGS RELATING TO LOCAL 521's
16 annual budget and/or budgets covering and/or applicable to calendar year 2007 or any
17 portion thereof.

18 **REQUEST FOR PRODUCTION NO. 36:**

19 Produce all DOCUMENTS and WRITINGS RELATING TO SEIU-UHW's
20 annual budget and/or budgets covering and/or applicable to calendar years 2007 and 2008
21 or any portion thereof.

22 **REQUEST FOR PRODUCTION NO. 37:**

23 Produce all DOCUMENTS and WRITINGS RELATING TO all minutes of any
24 general membership meetings for LOCAL 715 (including, without limitation, all regular
25 and special general membership meetings) held between July 1, 2005 and June 9, 2007.

26 **REQUEST FOR PRODUCTION NO. 38:**

27 Produce all DOCUMENTS and WRITINGS RELATING TO all minutes of any
28 general membership meetings for LOCAL 521 (including, without limitation, all regular

1 and special general membership meetings) held between January 1, 2007 and June 9,
2 2007.

3 **REQUEST FOR PRODUCTION NO. 39:**

4 Produce all DOCUMENTS and WRITINGS RELATING TO all minutes of any
5 general membership meetings for SEIU-UHW (including, without limitation, all regular
6 and special general membership meetings) which reference in any manner the
7 representation of any employees of RESPONDENT and were held between July 1, 2005
8 and June 9, 2007.

9 **REQUEST FOR PRODUCTION NO. 40:**

10 Produce all DOCUMENTS and WRITINGS RELATING TO all bank records of
11 LOCAL 715 showing all dues receipts deposits in accounts held by LOCAL 715 from
12 January 2006 to the present.

13 **REQUEST FOR PRODUCTION NO. 41:**

14 Produce all DOCUMENTS and WRITINGS RELATING TO all bank records of
15 LOCAL 521 showing all dues receipts deposits in accounts held by LOCAL 521 received
16 from or on behalf of any employees of RESPONDENT from January 2006 to the present.

17 **REQUEST FOR PRODUCTION NO. 42:**

18 Produce all DOCUMENTS and WRITINGS RELATING TO all bank records of
19 SEIU-UHW showing all dues receipts deposits in accounts held by SEIU-UHW received
20 from or on behalf of any employees of RESPONDENT from January 2006 to the present.

21 **REQUEST FOR PRODUCTION NO. 43:**

22 Produce all DOCUMENTS and WRITINGS RELATING TO the assignment or
23 other appointment of any employee of SEIU-UHW to provide services to LOCAL 715
24 RELATING TO the representation of any employees of RESPONDENT.

25 **REQUEST FOR PRODUCTION NO. 44:**

26 Produce all DOCUMENTS and WRITINGS RELATING TO the assignment or
27 other appointment of any employee of SEIU-UHW to provide services to LOCAL 521
28 RELATING TO the representation of any employees of RESPONDENT.

REQUEST FOR PRODUCTION NO. 45:

Produce all DOCUMENTS and WRITINGS RELATING TO the assignment or other appointment of counsel by SEIU-UHW to provide services to LOCAL 715 RELATING TO the representation of any employees of RESPONDENT.

REQUEST FOR PRODUCTION NO. 46:

Produce all DOCUMENTS and WRITINGS RELATING TO the assignment or other appointment of counsel by SEIU-UHW to provide services to LOCAL 521 RELATING TO the representation of any employees of RESPONDENT.

REQUEST FOR PRODUCTION NO. 47:

Produce all DOCUMENTS and WRITINGS RELATING TO the assignment or other appointment of counsel by LOCAL 521 to provide services RELATING TO the representation of any employees of RESPONDENT.

REQUEST FOR PRODUCTION NO. 48:

Produce all DOCUMENTS and WRITINGS RELATING TO LOCAL 715's representation employees of Stanford University from January 2006 to the present.

REQUEST FOR PRODUCTION NO. 49:

Produce all DOCUMENTS and WRITINGS RELATING TO LOCAL 715's representation employees of Santa Clara University from January 2006 to the present.

REQUEST FOR PRODUCTION NO. 50:

Produce all DOCUMENTS and WRITINGS RELATING TO the assignment or other appointment of any employee of LOCAL 1877 (or any other LOCAL) to provide services to LOCAL 715 RELATING TO the representation of any employees of Stanford University from January 2006 to the present.

REQUEST FOR PRODUCTION NO. 51:

Produce all DOCUMENTS and WRITINGS RELATING TO the assignment or other appointment of any employee of LOCAL 1877 (or any other LOCAL) to provide services to LOCAL 715 RELATING TO the representation of any employees of Santa Clara University from January 2006 to the present.

REQUEST FOR PRODUCTION NO. 52:

Produce all DOCUMENTS and WRITINGS RELATING TO any correspondence between LOCAL 1877 (and/or any other LOCAL) and LOCAL 715 RELATING TO the representation of any employees of Stanford University from January 2006 to the present.

REQUEST FOR PRODUCTION NO. 53:

Produce all DOCUMENTS and WRITINGS RELATING TO any correspondence between LOCAL 1877 (and/or any other LOCAL) and LOCAL 715 RELATING TO the representation of any employees of Santa Clara University from January 2006 to the present.

REQUEST FOR PRODUCTION NO. 54:

Produce all DOCUMENTS and WRITINGS RELATING TO any correspondence between LOCAL 1877 (and/or any other LOCAL) and LOCAL 521 RELATING TO the representation of any employees of Stanford University from January 2006 to the present.

REQUEST FOR PRODUCTION NO. 55:

Produce all DOCUMENTS and WRITINGS RELATING TO any correspondence between LOCAL 1877 (and/or any other LOCAL) and LOCAL 521 RELATING TO the representation of any employees of Santa Clara University from January 2006 to the present.

REQUEST FOR PRODUCTION NO. 56:

Produce all DOCUMENTS and WRITINGS RELATING TO any exchange of funds between LOCAL 1877 (and/or any other LOCAL) and LOCAL 715 (including, without limitation, any transfer of funds, payment of funds and/or receipt of funds).

REQUEST FOR PRODUCTION NO. 57:

Produce all DOCUMENTS and WRITINGS RELATING TO any exchange of funds between LOCAL 1877 (and/or any other LOCAL) and LOCAL 521 (including, without limitation, any transfer of funds, payment of funds and/or receipt of funds).

1 Dated: May 13, 2008

2 FOLEY & LARDNER LLP
3 LAURENCE R. ARNOLD
4 EILEEN R. RIDLEY
5 SCOTT P. INCIARDI

6 By: 

7 EILEEN R. RIDLEY
8 Attorneys for RESPONDENTS
9 STANFORD HOSPITAL & CLINICS
10 and LUCILE PACKARD CHILDREN'S
11 HOSPITAL
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PROOF OF SERVICE

I am employed in the **County of San Francisco, State of California**. I am over the age of 18 and not a party to this action; my current business address is **One Maritime Plaza, Sixth Floor, San Francisco, CA 94111-3409**.

On **May 13, 2008**, I served the foregoing document(s) described as: **REQUEST FOR PRODUCTION OF DOCUMENTS, SET NO. ONE** on the interested parties in this action as follows:

X BY THE FOLLOWING MEANS:

I placed a true copy thereof enclosed in sealed envelope(s) addressed as follows:

*Attorneys for Petitioner SERVICE
EMPLOYEES INTERNATIONAL
UNION LOCAL 715


Bruce A. Harland
Weinberg, Roger & Rosenfeld
1001 Marina Village Parkway, Suite 200
Alameda, California 94501-1091

X BY MAIL

x I am readily familiar with the firm's practice of collection and processing correspondence for mailing with the United States Postal Service; the firm deposits the collected correspondence with the United States Postal Service that same day, in the ordinary course of business, with postage thereon fully prepaid, at **San Francisco, California**. I placed the envelope(s) for collection and mailing on the above date following ordinary business practices.

X Executed on **May 13, 2008**, at **San Francisco, California**.

X I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.



TERESA SCHUMAN